

**MARKS, O'NEILL, O'BRIEN,
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251-109567 (CMS/CEF)

Rezart Zeqo

vs.

Selco Manufacturing Corp. and Peter Hutchinson

**ATTORNEY FOR DEFENDANTS
Selco Manufacturing Corp. and
Peter Hutchinson**

**UNITED STATES DISTRICT
COURT
DISTRICT OF NEW JERSEY**

CASE NO.: 2:21-cv-15240

CIVIL ACTION

ANSWER TO COMPLAINT

Defendants Selco Manufacturing Corp. and Peter Hutchinson, hereby respond to Plaintiff's Complaint as follows:

JURISDICTION AND VENUE

1. The averments contained in this paragraphs state conclusions of law to which no answer is required.
2. Averments contained in this paragraph state conclusions of law to which no answer is required.
3. Averments contained in this paragraph state conclusions of law to which no answer is required.

PARTIES

4. Admitted.

5. Admitted.

6. Denied.

FACTS

7. Denied as stated.

8. Admitted.

9. Admitted.

10. Admitted.

11. Denied as stated.

12. Denied.

13. Denied as stated.

14. Denied.

15. Denied.

16. Denied.

17. Denied.

18. Denied as stated.

19. Denied as stated.
20. Denied as stated.
21. Denied as stated.
22. Denied as stated.
23. Denied as stated.
24. Denied. After reasonable investigation, Answering Defendants lack sufficient knowledge or information to form a belief as to the truth of the averments contained in this paragraph and, therefore, deny same and demand strict proof thereof at trial.
25. Denied.
26. Admitted.
27. Denied as stated.
28. Denied as stated.
29. Denied. After reasonable investigation, Answering Defendants lack sufficient knowledge or information to form a belief as to the truth of the averments contained in this paragraph and, therefore, deny same and demand strict proof thereof at trial.
30. Denied as stated.
31. Denied.
32. Denied as stated.

33. Denied as stated.

FIRST CLAIM FOR RELIEF

**(Retaliation in Violation of the New Jersey Conscientious Employee Protection Act,
N.J.S.A. 34:19)**

34. Answering Defendants incorporate by reference its answers to all previous allegations as though same were fully set forth herein at length.

35. Averments contained in this paragraph state conclusions of law to which no answer is required.

36. Denied as stated.

37. Denied.

38. Denied as stated.

39. Denied as stated.

SECOND CLAIM FOR RELIEF

(Untimely Payment of Wages - New Jersey State Wage Payment Law, N.J.S.A. 34:11-4.1 et seq.)

40. Answering Defendants incorporate by reference its answers to all previous allegations in all previous counts as though same were fully set forth herein at length.

41. Denied.

42. Denied. After reasonable investigation, Answering Defendants lack sufficient knowledge or information to form a belief s to the truth of the averments contained in this paragraph and, therefore, denies same and demands strict proof thereof at trial.

WHEREFORE, Defendants, Selco Manufacturing Corp. and Peter Hutchinson, demand judgment be entered in their favor and against all other parties.

FIRST AFFIRMATIVE DEFENSE

The Answering Defendants violated no duty or obligation owed to the Plaintiff.

SECOND AFFIRMATIVE DEFENSE

The Answering Defendants performed each and every duty which may have been owed to the Plaintiff.

THIRD AFFIRMATIVE DEFENSE

The allegations described in the Complaint were caused wholly or partly by the negligence or intentional acts of the Plaintiff, and Plaintiff is barred from recovery or her recovery is reduced thereby.

FOURTH AFFIRMATIVE DEFENSE

The allegations in the case were caused wholly or partly by persons or instrumentalities other than the Answering Defendants and over whom the Answering Defendants exercised no control.

FIFTH AFFIRMATIVE DEFENSE

Plaintiff's Complaint fails to state a claim upon which relief may be granted against the Answering Defendants, and the Answering Defendants reserve the right to move at the time of trial or prior thereto to dismiss Plaintiff's Complaint.

SIXTH AFFIRMATIVE DEFENSE

All services rendered by the Answering Defendants were rendered in accordance with accepted standards and practices and not in a negligent manner.

SEVENTH AFFIRMATIVE DEFENSE

Plaintiff's claims are barred in whole or in part by reason of the Doctrine of Waiver, Estoppel and/or Laches.

DESIGNATION OF TRIAL COUNSEL

PLEASE TAKE NOTICE Christian M. Scheuerman, Esquire is hereby designated trial counsel.

JURY DEMAND

Defendants, Selco Manufacturing Corp. and Peter Hutchinson, demand a trial by jury on all issues.

MARKS, O'NEILL, O'BRIEN,
DOHERTY & KELLY, P.C.

/s/ Christian M. Scheuerman _____
Christian M. Scheuerman, Esquire
Attorney for Defendants
Selco Manufacturing Corp. and Peter Hutchinson

